Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
Challenge Process to Competitive Coverage)	
in the Alternative Connect America Cost)	
Model (A-CAM))	
)	

COMMENTS OF TABLE TOP TELEPHONE COMPANY INC.

Table Top Telephone Company Inc. (Table Top) (SAC 453334) hereby submits the following challenge regarding certain census blocks in its Arizona study area being designated as "wired-served" or "wireless-served" in v2.2 of the Alternative Connect America Cost Model (A-CAM). A review of the June 30, 2015 FCC Form 477 data identified competitive providers which may have led to the "served" designation. "Attachment A" to this filing contains a list of the census blocks for which Table Top seeks to contest the existence of a qualifying competitor, organized by the competitor identified in Form 477 data as serving in the block. Below is a narrative on each of the competitors demonstrating how they fail to offer service meeting all of the requisite requirements in the blocks being challenged.

Mediacom Arizona LLC

Mediacom Arizona does not offer voice or Internet service in the contested census blocks or anywhere in Table Top's study area. Table Top's study area consists of the town of Ajo, AZ and the immediate surrounding area. "Attachment B" is a screenshot from MediaCom's website (https://mediacomcable.com/site/about_local_address.php) that shows the services available from Mediacom in the Ajo area. Note that there are checkmarks next to digital TV and HDTV,

but there is no checkmark next to high-speed Internet. "Attachment C" is Mediacom's "Rates and Services Price List" for Ajo, AZ. The list only shows digital TV services.

In addition, there is no interconnection agreement between Table Top and Mediacom, nor has Table Top ever received notice from Mediacom requesting to port numbers.

To be certain that Mediacom does not offer voice or Internet service in Table Top's study area, several addresses from the contested census blocks were entered into Mediacom's address lookup tool on their website. In each instance, a message was returned that said the user must call (844) 385-5773 to get information on the services that were offered at their address. When a Table Top team member placed a call to that number, the response from the Mediacom representative was that Mediacom only offers cable television service in the Ajo area; they do not offer telephone or Internet services in Ajo.

Midvale Telephone Company

Midvale Telephone Company is a rate-of-return ILEC whose study area is adjacent to Table Top's study area. The contested census block is a "split" block that contains part of each company's study area. Midvale does not offer any services to any of the locations in the block that reside within Table Top's study area.

Transworld Network Corp.

Transworld Network Corp. does not offer a qualifying broadband service plan with either (a) speeds that meet the FCC's standard of *actual* speeds of at least 10/1 Mbps, or (b) a rate that is at or below the applicable reasonably comparable benchmark rate. "Attachment D" of this filing is a screenshot from Transworld's website (http://wi-power.com/media-rates.html) showing their residential Internet plans in Arizona. Transworld's best Internet plan, the "Media 10", provides *up to* 10 Mbps download speed. The fine print at the bottom of the page states that "Customers on qualifying plans may receive maximum download speeds ranging from 1.5 Mbps to 10 Mbps. Actual download speeds will vary." (emphasis added) Clearly, 10 Mbps download is an "up to" advertised speed, not the actual speed that is provided, and the FCC has indicated that its speed standards refer to the actual speeds being provided. This alone should disqualify Transworld as a

qualifying competitor because customers are unable to consistently obtain an actual download speed of at least 10 Mbps.

In addition, the "Media 10" plan is priced at \$99.95, which exceeds the \$75.20 reasonable comparability benchmark for 10/1 Mbps, unlimited service by \$24.75. Thus, even if the FCC were to accept the "Media 10" offering as a qualifying service based on speed, it is still disqualified based on its failure to be priced at or below the applicable reasonable comparability benchmark.

Respectfully submitted,

/s/ Matthew J. Boos Matthew J. Boos General Manager and Secretary

Table Top Telephone Company Inc. 600 North Second Avenue Ajo, AZ 85321 (520) 387-7676

April 26, 2016

Census Block	Competitor Identified in FCC Form 477 Data
040194704001000	Mediacom Arizona LLC
040194704001001	Mediacom Arizona LLC
040194704001002	Mediacom Arizona LLC
040194704001005	Mediacom Arizona LLC
040194704001007	Mediacom Arizona LLC
040194704001008	Mediacom Arizona LLC
040194704001009	Mediacom Arizona LLC
040194704001010	Mediacom Arizona LLC
040194704001011	Mediacom Arizona LLC
040194704001013	Mediacom Arizona LLC
040194704001014	Mediacom Arizona LLC
040194704001015	Mediacom Arizona LLC
040194704001016	Mediacom Arizona LLC
040194704001017	Mediacom Arizona LLC
040194704001018	Mediacom Arizona LLC
040194704001019	Mediacom Arizona LLC
040194704001020	Mediacom Arizona LLC
040194704001021	Mediacom Arizona LLC
040194704001022	Mediacom Arizona LLC
040194704001023	Mediacom Arizona LLC
040194704001024	Mediacom Arizona LLC
040194704001025	Mediacom Arizona LLC
040194704001026	Mediacom Arizona LLC
040194704001027	Mediacom Arizona LLC
040194704001028	Mediacom Arizona LLC
040194704001029	Mediacom Arizona LLC
040194704001030	Mediacom Arizona LLC
040194704001031	Mediacom Arizona LLC
040194704001032	Mediacom Arizona LLC
040194704001033	Mediacom Arizona LLC
040194704001034	Mediacom Arizona LLC
040194704001035	Mediacom Arizona LLC
040194704001036	Mediacom Arizona LLC
040194704001037	Mediacom Arizona LLC
040194704001038	Mediacom Arizona LLC
040194704001039	Mediacom Arizona LLC
040194704001040	Mediacom Arizona LLC
040194704001041	Mediacom Arizona LLC
040194704001042	Mediacom Arizona LLC

Census Block	Competitor Identified in FCC Form 477 Data
040194704001043	Mediacom Arizona LLC
040194704001044	Mediacom Arizona LLC
040194704001045	Mediacom Arizona LLC
040194704001046	Mediacom Arizona LLC
040194704001047	Mediacom Arizona LLC
040194704001048	Mediacom Arizona LLC
040194704001049	Mediacom Arizona LLC
040194704001050	Mediacom Arizona LLC
040194704001051	Mediacom Arizona LLC
040194704001052	Mediacom Arizona LLC
040194704001053	Mediacom Arizona LLC
040194704001054	Mediacom Arizona LLC
040194704001055	Mediacom Arizona LLC
040194704002038	Mediacom Arizona LLC
040194704002039	Mediacom Arizona LLC
040194704002040	Mediacom Arizona LLC
040194704002042	Mediacom Arizona LLC
040194704002045	Mediacom Arizona LLC
040194704002053	Mediacom Arizona LLC
040194704002069	Mediacom Arizona LLC
040194704002071	Mediacom Arizona LLC
040194704002072	Mediacom Arizona LLC
040194704002074	Mediacom Arizona LLC
040194704002090	Mediacom Arizona LLC
040194704002121	Mediacom Arizona LLC
040194704002122	Mediacom Arizona LLC
040194704002123	Mediacom Arizona LLC
040194704002124	Mediacom Arizona LLC
040194704002129	Mediacom Arizona LLC
040194704002131	Mediacom Arizona LLC
040194704002132	Mediacom Arizona LLC
040194704002133	Mediacom Arizona LLC
040194704002136	Mediacom Arizona LLC
040194704002137	Mediacom Arizona LLC
040194704002140	Mediacom Arizona LLC
040194704002141	Mediacom Arizona LLC
040194704002142	Mediacom Arizona LLC
040194704002143	Mediacom Arizona LLC
040194704002144	Mediacom Arizona LLC
040194704002145	Mediacom Arizona LLC

Census Block	Competitor Identified in FCC Form 477 Data
040194704002146	Mediacom Arizona LLC
040194704002147	Mediacom Arizona LLC
040194704002150	Mediacom Arizona LLC
040194704002151	Mediacom Arizona LLC
040194704002153	Mediacom Arizona LLC
040194704002330	Mediacom Arizona LLC
040194704002331	Mediacom Arizona LLC
040194704002332	Mediacom Arizona LLC
040194704002333	Mediacom Arizona LLC
040194704002334	Mediacom Arizona LLC
040194704002335	Mediacom Arizona LLC
040194704002336	Mediacom Arizona LLC
040194704002337	Mediacom Arizona LLC
040194704002338	Mediacom Arizona LLC
040194704002339	Mediacom Arizona LLC
040194704002340	Mediacom Arizona LLC
040194704002342	Mediacom Arizona LLC
040194704002343	Mediacom Arizona LLC
040194704002344	Mediacom Arizona LLC
040194704002345	Mediacom Arizona LLC
040194704002346	Mediacom Arizona LLC
040194704002347	Mediacom Arizona LLC
040194704002349	Mediacom Arizona LLC
040194704002350	Mediacom Arizona LLC
040194704002352	Mediacom Arizona LLC
040194704002353	Mediacom Arizona LLC
040194704002354	Mediacom Arizona LLC
040194704002355	Mediacom Arizona LLC
040194704002356	Mediacom Arizona LLC
040194704002357	Mediacom Arizona LLC
040194704002359	Mediacom Arizona LLC
040194704002367	Mediacom Arizona LLC
040194704002368	Mediacom Arizona LLC
040194704002369	Mediacom Arizona LLC
040194704002370	Mediacom Arizona LLC
040194704002371	Mediacom Arizona LLC
040194704003000	Mediacom Arizona LLC
040194704003002	Mediacom Arizona LLC
040194704003003	Mediacom Arizona LLC
040194704003005	Mediacom Arizona LLC

Census Block	Competitor Identified in FCC Form 477 Data
040194704003006	Mediacom Arizona LLC
040194704003007	Mediacom Arizona LLC
040194704003008	Mediacom Arizona LLC
040194704003009	Mediacom Arizona LLC
040194704003010	Mediacom Arizona LLC
040194704003011	Mediacom Arizona LLC
040194704003012	Mediacom Arizona LLC
040194704003013	Mediacom Arizona LLC
040194704003014	Mediacom Arizona LLC
040194704003015	Mediacom Arizona LLC
040194704003016	Mediacom Arizona LLC
040194704003017	Mediacom Arizona LLC
040194704003018	Mediacom Arizona LLC
040194704003019	Mediacom Arizona LLC
040194704003020	Mediacom Arizona LLC
040194704003021	Mediacom Arizona LLC
040194704003022	Mediacom Arizona LLC
040194704003023	Mediacom Arizona LLC
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040194704003028	Mediacom Arizona LLC
040194704003029	Mediacom Arizona LLC
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040194704003031	Mediacom Arizona LLC
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040194704003034	Mediacom Arizona LLC
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040194704003037	Mediacom Arizona LLC
040194704003038	Mediacom Arizona LLC
040194704003039	Mediacom Arizona LLC
040194704003040	Mediacom Arizona LLC
040194704003041	Mediacom Arizona LLC
040194704003042	Mediacom Arizona LLC
040194704003043	Mediacom Arizona LLC
040194704003044	Mediacom Arizona LLC
040194704003045	Mediacom Arizona LLC
040194704003046	Mediacom Arizona LLC

Census Block	Competitor Identified in FCC Form 477 Data
040194704003047	Mediacom Arizona LLC
040194704003048	Mediacom Arizona LLC
040194704003049	Mediacom Arizona LLC
040194704004000	Mediacom Arizona LLC
040194704004001	Mediacom Arizona LLC
040194704004002	Mediacom Arizona LLC
040194704004003	Mediacom Arizona LLC
040194704004005	Mediacom Arizona LLC
040194704004008	Mediacom Arizona LLC
040194704004010	Mediacom Arizona LLC
040194704004011	Mediacom Arizona LLC
040194704004012	Mediacom Arizona LLC
040194704004013	Mediacom Arizona LLC
040194704004014	Mediacom Arizona LLC
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040194704004017	Mediacom Arizona LLC
040194704004018	Mediacom Arizona LLC
040194704004020	Mediacom Arizona LLC
040194704004021	Mediacom Arizona LLC
040194704004023	Mediacom Arizona LLC
040194704004024	Mediacom Arizona LLC
040194704004026	Mediacom Arizona LLC
040194704004027	Mediacom Arizona LLC
040194704004028	Mediacom Arizona LLC
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040194704004030	Mediacom Arizona LLC
040194704004031	Mediacom Arizona LLC
040194704004032	Mediacom Arizona LLC
040194704004033	Mediacom Arizona LLC
040194704004034	Mediacom Arizona LLC
040194704004035	Mediacom Arizona LLC
040194704004036	Mediacom Arizona LLC
040194704004038	Mediacom Arizona LLC
040194704004039	Mediacom Arizona LLC
040194704004040	Mediacom Arizona LLC
040194704004041	Mediacom Arizona LLC
040194704004043	Mediacom Arizona LLC
040194704004044	Mediacom Arizona LLC
040194704004045	Mediacom Arizona LLC

Attachment A

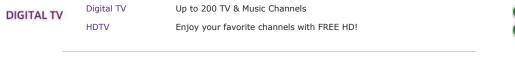
Census Block	Competitor Identified in FCC Form 477 Data
040194704004046	Mediacom Arizona LLC
040194704004047	Mediacom Arizona LLC
040194704004048	Mediacom Arizona LLC
040194704004049	Mediacom Arizona LLC
040194704004050	Mediacom Arizona LLC
040194704004051	Mediacom Arizona LLC
040194704004052	Mediacom Arizona LLC
040194704004053	Mediacom Arizona LLC
040194704004054	Mediacom Arizona LLC
040194704004055	Mediacom Arizona LLC
040250012002318	Midvale Telephone Company
040250021002063	TRANSWORLD NETWORK, CORP

Attachment B









HIGH SPEED INTERNET

Services may not be available in all areas View Rates & Services information here.

Company	Products	My Mediacom	Social Media	
About Us	Xtream	Mediacom Today		
Investor Relations	Internet	Web Mail	f	
Careers	TV	My Account	You	
News	TiVo	Support	You Tube	
Advertise On Mediacom	Home Security	Contact Us		
Digital Rollout	Phone		9	
Parental Controls	Service Guarantees			
Our Locations				
Get all the info you need right here at I © 2015 Mediacom Communications Co	MediacomCable.com. Make <u>MediacomToda</u> rporation. All Rights Reserved.	<u>ay.com</u> your homepage.		
Site Map				
Legal Terms, Conditions & Policies Website Privacy Policy & Terms of Use Important Internet Service Practices View Standard rates in your area				

14102201

RATES & SERVICES PRICE LIST

Ajo, AZ

Effective November 30, 2015

Digital TV Service Rates

(All stated rates are monthly rates unless otherwise stated.)

Family TV	5
Prime TV (includes Family TV, Starz/Encore, Digital Converter and Digital Gateway)	5
Local Broadcast Station Surcharge	0
Regional Sports Surcharge\$3.98	8
HBO*\$18.99	5
Showtime*	5
Cinemax*	5
Starz/Encore*	0
Digital Plus*†\$16.00	0
Digital Gateway (Digital Converter required. Includes Interactive Guide, Digital Music and VOD/PPV access.)\$4.00	
Digital Video Recorder Service\$10.99	5
Digital Video Recorder Service Each Additional Device	0
Nonstandard DVR Fee	0

Monthly Equipment Fees

Not all video service features may be available based on your equipment choices.)

Digital Converter with Remote*	\$6.50
Digital Adapter [†]	\$0.99
Cable Card** (for use with your retail device)	\$1.99
*Will not enable Mediacom interactive guide or VOD/PPV access without Digital Gateway.	

†Does not support Interactive Guide, Digital Music, VOD/PPV access or Premium Services.

Installation & Other Fees Digital TV Installation Fees

Standard Installation*	
Installation of Additional Outlet (same trip)	\$15.00
Installation of Additional Outlet (separate trip)	\$29.00
Other Fees	
Home Wire Maintenance	\$4.95
Processing Fee for Payment by Phone with Customer Service Rep	\$5.00
Activation Fee	\$10.00
Field Reactivation of Account	\$29.00
Electronic Reactivation of Account	\$1.99
Transfer of Service	\$29.00
Hourly Service Charge	\$29.00
mounty convice on anger	Ψ20.00

Field Change of Service.....\$29.00

Electronic Change of Service	\$2.00
Transfer Activation Fee	
Late Payment Charge	\$8.50
Field Collection Charge	
Insufficient Funds Handling Charge	
Connection of Consumer Owned Equipment** (same trip)	
Connection of Consumer Owned Equipment** (separate trip)	
Unreturned Cable Modem	\$139.00
Unreturned External Hard Drive	\$100.00
Unreturned Standard Digital Receiver	\$450.00
Unreturned HD, DVR, HD/DVR, Digital Receiver	
Unreturned Receiver Remote Control	\$25.00
Unreturned Digital Adapter	\$100.00
Unreturned Cable Card	\$300.00 at on Mediacom's network.

work is not included.

**This is a per item charge, including such items as a VCR, DVD player, home stereo, game equipment, etc.

Billing Policies

Services are billed one month in advance. Payments are due by the tenth day after the "bill from" date, after which a late payment charge will apply. Seven days advance notice is required for termination of service. All leased equipment must be returned.

Taxes and Fees

Listed rates do not include franchise fees, copyright, taxes or other associated surcharges, Federal, state and local taxes, governmental regulatory fees and surcharges.

How to Contact Us

Call Contor (a	055 622 4226
Lall Lemer (24 hours a day/7 days a week)	 833-b33-4//b

Visit us on the Web: www.mediacomcable.com

To view internet usage, visit: www.mediacomtoday.com

Local Office 1 Pajaro, Ajo, AZ 85321

Hours: 8am-4pm, M,W,F



Attachment D

